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December 16, 2020

VIA ECF and E-MAIL

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

DENIED. SO ORDERED.

Date: 12/16/2020
New York, New York

Mary Kay Vyskocil
Mary Kay Vyskocil
United States District Judge

Re: United States of America v. Rick Dane, Jr.
20 Cr. 160-10 (MKV)
Request to Travel

Dear Judge Vyskocil:

I am the attorney for the defendant in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006 A. Mr. Dane was charged by indictment and the Court set certain conditions for his release which limited his travel primarily to the Southern and Eastern Districts of New York. The defense is writing to respectfully request that Mr. Dane be granted permission to travel from December 22, 2020 to drive to Ohio and then to Illinois to see his son and other family members during the Christmas holiday. Mr. Dane would then return to New York on December 28, 2020.

If the Court grants the application, the defense proposes that Mr. Dane would drive from New York to Middletown, Ohio and remain at his cousin’s home. The family has reservations at a diner in nearby Lebanon, Ohio on December 23, 2020.¹ Mr. Dane would also respectfully request that he be allowed to drive from Middletown, Ohio on December 24, 2020 to Crete, Illinois to visit with his son on Christmas and remain in Crete, Illinois until returning to New York on December 28, 2020.

I have conferred with Mr. Dane’s Pretrial Services officer and the Government. Pretrial Services and the Government have no objection to Mr. Dane’s request to travel. Mr. Dane has complied with all of the conditions of release that have been imposed by the Court in the instant case.

¹ The distance between Middletown, Ohio and Lebanon, Ohio is 14 miles.

Respectfully submitted,

/s/

Calvin H. Scholar

cc: United States Attorney for the
Southern District of New York

Mr. Vincent Adams,
SDNY Pretrial Services